

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

MAY 14 2024
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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

VS.

**SHANNON CONCHO and
LOUANN JOHNSON,**

Defendants.

CRIMINAL NO. 24CR189-MLG

Count 1: 18 U.S.C. §§ 1153 and 113(a)(1):
Assault with Intent to Commit Murder; 18
U.S.C. § 2: Aiding and Abetting;

**Count 2: 18 U.S.C. §§ 1153 and 113(a)(6):
Assault Resulting in Serious Bodily
Injury; 18 U.S.C. § 2: Aiding and
Abetting;**

**Count 3: 18 U.S.C. §§ 1153 and 371:
Conspiracy to Commit Assault with Intent
to Commit Murder.**

SUPERSEDING INDICTMENT

The Grand Jury charges:

Count 1

On or about September 3, 2023, in Indian Country, in McKinley County, in the District of New Mexico, the defendants, **SHANNON CONCHO** and **LOUANN JOHNSON**, both Indians, assaulted John Doe, and the assault was done with the specific intent to commit murder.

In violation of 18 U.S.C. §§ 1153, 113(a)(1), and 2.

Count 2

On or about September 3, 2023, in Indian Country, in McKinley County, in the District of New Mexico, the defendants, **SHANNON CONCHO** and **LOUANN JOHNSON**, both Indians, assaulted John Doe, and the assault resulted in serious bodily injury.

In violation of 18 U.S.C. §§ 1153, 113(a)(6), and 2.

Count 3

1. On or about September 3, 2023, in Indian Country, in McKinley County, in the

District of New Mexico, the defendants, **SHANNON CONCHO** (“**CONCHO**”) and **LOUANN JOHNSON** (“**JOHNSON**”), both Indians, knowingly, unlawfully and willfully combined, conspired, confederated, agreed, and acted interdependently with one another and with others unknown to the Grand Jury to commit assault with intent to commit murder, contrary to 18 U.S.C. §§ 1153 and 113(a)(1).

Manner and Means

2. The manner and means by which the defendants, **CONCHO** and **JOHNSON**, sought to accomplish the objectives of the conspiracy included, among other things, the following:

- a. Joining with one another in a verbal altercation against John Doe;
- b. Assisting one another in assaulting John Doe;
- c. Assisting one another in preventing John Doe from calling for help;
- d. Fleeing the scene with one another;

Overt Acts

3. In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the District of New Mexico, and elsewhere:

- a. On or about September 3, 2023, **CONCHO** and **JOHNSON** joined with one another in a verbal altercation against John Doe;
- b. On or about September 3, 2023, **JOHNSON** slapped John Doe across the face multiple times;
- c. On or about September 3, 2023, **CONCHO** and **JOHNSON** took John Doe’s phones to prevent him from calling 911;

d. On or about September 3, 2023, **CONCHO** began beating John Doe over the head with a chair;

e. On or about September 3, 2023, during the course of the beating, **CONCHO** stated his intent to murder John Doe;

f. On or about September 3, 2023, after stating his intent to murder John Doe, **CONCHO** instructed **JOHNSON** to kick John Doe in the head because **JOHNSON** was wearing boots;

g. On or about September 3, 2023, **JOHNSON** complied with **CONCHO'S**; instruction and kicked John Doe in the head;

h. On or about September 3, 2023, **JOHNSON** alerted **CONCHO** that **JOHNSON'S** mother called the police;

i. On or about September 3, 2023, **JOHNSON** and **CONCHO** attempted to prevent **JOHNSON'S** mother from calling the police;

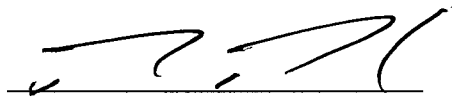
j. On or about September 3, 2023, **JOHNSON** suggested that **JOHNSON** and **CONCHO** flee the scene; and

k. On or about September 3, 2023, **CONCHO** and **JOHNSON** fled the scene together.

In violation of 18 U.S.C. §§ 1153 and 371.

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY


Assistant United States Attorney
